GIA Environmental Health and Safety Environmental Program Elements Standard

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ABSTRACT: The purpose of this GIA standard is to define the basic elements and responsibilities of a site Environmental Program.

APPLICABILITY: This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent local regulations.

STATUS: APPROVED 24-Dec-1991; use VTX SMC for current status.

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1 INTRODUCTION

The purpose of this GIA standard is to define the basic elements and responsibilities of a site Environmental Program.

1.1 SCOPE

This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent country and/or local regulations.

1.1.1 Policy

GIA shall:

- Provide its employees with a safe and healthful work place.
- Operate its business to avoid harming the environment and the community.
- Conserve natural resources.
- Design, produce, and distribute products in a safe and environmentally sound manner.
- Communicate known hazards, along with necessary safety precautions to employees, customers, and the community.
- Evaluate potential hazards associated with its products and operations.
- Consider full compliance with the law as being the minimum acceptable standard.

1.2 RESPONSIBILITIES

Responsibilities of persons involved in fulfilling the requirements of this document are:

- Site Manager

  Comply with Environmental Health and Safety (EH&S) Laws and Regulations.

  Adherence to all applicable Digital and GIA policies, standards, and guidelines.

  Ensure excellence in the site's Environmental Program performance.

  Assignment of an EH&S staff manager to fulfill and communicate program regulations, policies, standards, procedures, and guidelines to management and employees.

  Develop and assure compliance with site environmental policies, standards, and procedures.

  Monitor and evaluate Environmental Program performance.

  Hold employees accountable for their portions of this standard.

- Site Environmental Health and Safety (EH&S)

  Assist management and consult in the development, operation, and maintenance of the site Environmental Program.

- Area Environmental Health and Safety (EH&S) Manager

  Develop and communicate specific GIA EH&S policies and standards.

  Provide assistance in the development of procedures, tools, training, and mechanisms to assist GIA sites and operations in complying with these policies.

- Employees

  Participate in the Environmental Program.

  Provide input and assist in decisions regarding environmental issues that affect them.

  Report environmental discrepancies to EH&S and/or Security to minimize the impact to employees and/or the community.

  Be sufficiently trained to carry out their environmental responsibilities.

1.3 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local language.

2 PROGRAM ELEMENTS

This segment describes the elements of the Environmental Program that include, program administration, waste stream management, hazardous and nonhazardous waste management, water quality management, air quality management, and emergency response planning.

2.1 PROGRAM ADMINISTRATION

The performance of the Environmental Program shall be evaluated at a minimum based on the:

Degree of regulatory and policy compliance.

Unit waste generation.

Degree to which waste and emissions reduction goals are met.

Response to emergencies and follow-up.

Development of new products or processes to reduce the amount and/or toxicity of necessary raw materials and potential exposure to employees, the environment, and the community.

Cost effectiveness.

A management plan for the Environmental Program shall be developed by the sites or plants and shall be updated annually with the concurrence and involvement of the functional management.

A Crisis Management Plan shall be in place and reviewed annually. Each site and operation shall maintain a state of preparedness to respond to emergency situations that may threaten the safety of employees, harm the environment or community, and/or the operation of the plant.

Records required by regulations, this policy, and in support of this program shall be maintained.

The necessary level of training shall be provided to personnel to fulfill their environmental responsibilities. Records of this training shall be maintained.

The environmental impact shall be minimized in the design of new installations, equipment, processes, or facilities.

A site inclusive permit inventory shall be prepared and maintained for all environmental and other business-related permits.

All correspondence with regulatory agencies shall be documented and kept on file.

Regulatory changes shall be reviewed, as they occur, to determine the impact of those changes on existing permits and plant operation.

Process and product developments shall be reviewed before they occur to determine the impact of those changes on the site's environmental compliance status.

A current set of country and/or local environmental regulations shall be maintained.

2.2 WASTE STREAM MANAGEMENT HIERARCHY

Waste streams shall be managed according to a hierarchy of management practices.

The most desirable practice is source reduction and the least desirable practice is landfilling.

The following shall be considered, as options, from the most desirable to the least desirable.

Source reduction: Does not produce the waste. Use less toxic or nonhazardous substitutes for toxic or hazardous materials.

Reuse: Use the waste for another purpose internally without treatment.

Recycle (internal): Treat the waste for reuse in the original process.

Recycle (external): Waste management company treats the waste for use in the original or similar process or use elsewhere in the open marketplace.

Reclaim (internal): Extract reusable materials from the waste for use or resale for another process.

Reclaim (external): Waste management company extracts reusable materials from the waste for use or resale for another process.

Treat (internal): Process the waste to reduce volume and/or hazard and reclaim or dispose of the remainder.

Treat (external): Waste management company treats the waste and reclaims or disposes of the remainder.

Incinerate (external): Waste management company destroys the waste through elevated temperature burning. Disposes or reclaims the residue.

Secured landfill (external): Waste management company buries the waste in a specially designed and monitored facility for hazardous wastes.

Unsecured landfill (external): Waste management company buries the waste in the ground. Hazardous wastes shall not be handled in this manner.

2.3 HAZARDOUS AND NONHAZARDOUS WASTE MANAGEMENT

A plan shall be in place to maintain compliance with applicable local and country regulations.

A waste minimization plan shall be developed, implemented, maintained, and documented, to hold the production unit responsible for new and existing equipment and processes. The need to dispose of hazardous and nonhazardous waste streams shall be minimized. This plan shall require the following, at a minimum.

Use of nonhazardous and nonregulated materials or the use of materials with reduced toxicity.

In-line and point-of-use treatment, recycling, and reclamation, where possible.

A comprehensive strategy shall be developed to address any new hazardous and nonhazardous waste stream, or any modification of an existing waste stream that triggers new regulatory requirements.

The plan shall assign responsibility for the production of the waste stream to the generating process.

Research and development projects shall include waste minimization and toxic use reduction in their strategies.

A program shall be in place to ensure that process equipment that generate hazardous and/or nonhazardous waste streams and their associated treatment equipment are maintained in proper working order.

Each site must evaluate its hazardous and/or nonhazardous waste streams and determine the required level of approvals and/or notifications. Required records and permits shall be reviewed annually, at a minimum, to ensure compliance with applicable regulations.

A comprehensive program must be in place to ensure that all hazardous and/or nonhazardous waste stream disposal permit requirements are met.

All site drawings, including process flow diagrams, instrumentation diagrams, piping diagrams, and so forth, shall be updated.

When instituting new processes, chemicals, or control equipment, there must be safeguards against transferring pollutants from one medium to another, to the extent that this is possible.

Hazardous and/or nonhazardous waste management companies and transporters shall be approved and periodically inspected.

Any potential violation of a hazardous and/or nonhazardous waste stream disposal regulation or a permit condition must *immediately* be reported to and verified by EH&S. Any confirmed violation must be investigated and reported to plant management, Area EH&S, the Law Department, and, if appropriate, the regulatory agencies.

2.4 WATER QUALITY MANAGEMENT

A plan shall be in place to maintain compliance with applicable local and country regulations.

A waste minimization plan shall be developed, implemented, maintained, and documented that holds the process units responsible for new and existing equipment and processes. The need to discharge of regulated pollutants shall be minimized. This plan shall require the following, at a minimum.

Use of nonhazardous and nonregulated materials or the use of materials with reduced toxicity.

In-line and point-of-use treatment, recycling, and reclamation, where possible.

A comprehensive strategy shall be developed to address any new wastewater discharge or any modification of an existing discharge that triggers new regulatory requirements.

The plan shall assign responsibility for the production of the discharge to the generating process.

Research and development projects shall include waste minimization and toxic use reduction in their strategies.

A program shall be in place to ensure that process equipment that discharges regulated pollutants and all wastewater treatment equipment are maintained in proper working order.

Each site must evaluate its wastewater discharge and determine the required level of permitting. Required records and permits shall be reviewed annually, at a minimum, to ensure compliance with applicable regulations.

A comprehensive program must be in place to ensure that all wastewater discharge permit requirements, including any monitoring requirements, are met.

All site drawings, including process flow diagrams, instrumentation diagrams, piping diagrams, and the like, shall be maintained.

When instituting new processes, chemicals, or control equipment, there must be safeguards against transferring pollutants from one medium to another, to the extent that this is possible.

Any potential violation of a water quality regulation or a permit condition must immediately be reported to and verified by EH&S. Any confirmed violation must be investigated and reported to plant management, Area EH&S, the Law Department, and, if appropriate, the regulatory agencies.

2.5 AIR QUALITY MANAGEMENT

A plan shall be in place to maintain compliance with applicable local and country regulations.

A waste minimization plan shall be developed, implemented, and documented to hold the process units responsible for new and existing equipment and processes. The need to discharge regulated pollutants shall be minimized. This plan shall require the following at a minimum.

Use of nonhazardous and nonregulated materials or the use of materials with reduced toxicity.

In-line and point-of-use treatment, recycling, and reclamation, where possible.

A comprehensive strategy shall be developed to address any new air emission source or any modification of an existing source that triggers new regulatory requirements.

The plan shall assign responsibility for the production of the air emission source to the generating process.

Research and development projects shall include waste minimization and toxic use reduction in their strategies.

A program shall be in place to ensure that process equipment that emits regulated air pollutants and associated air pollution abatement equipment are maintained in proper working order.

Each site must evaluate its sources of air emissions and determine the required level of permitting. Required permits and emissions inventories shall be reviewed annually, at a minimum, to ensure compliance with applicable regulations.

A comprehensive program shall be in place to ensure that all air emission permit requirements, including any monitoring requirements, are met.

When instituting new processes, chemicals, or control equipment, there must be safeguard against transferring pollutants from one medium to another to the extent that this is possible.

Any potential violation of an air quality regulation or a permit condition must *immediately* be reported to and verified by EH&S. Any confirmed violation must be investigated and reported to plant management Area EH&S, and the Law Department, and, if appropriate, the regulatory agencies.

2.6 EMERGENCY RESPONSE PLANNING

This segment describes the requirements for emergency response planning. Also see *EL-MF743-00, GIA Environmental Health and Safety Emergency Response Plan Standard.*

Each site shall comply with applicable regulations for emergency planning, emission, inventory reporting, and communication of risks to the community.

Each site shall have an Emergency Response Plan. The plan shall include appropriate procedures to:

Protect worker life, safety, and the environment in the event of a spill or accident.

Contain and cleanup spilled materials.

Assure proper incident notification.

Protect company assets.

Each site shall have an Emergency Response Team (ERT) that shall be responsible for implementing the Emergency Response Plan.

Each site shall assign an ERT director who shall coordinate efforts of the ERT during an emergency.

Each site shall ensure there is adequate emergency equipment to implement the Emergency Response Plan.

After an incident where the Emergency Response Plan has been implemented, or there has been a training exercise, the plan shall be assessed as to its effectiveness.

Response actions taken shall be reviewed after an incident or a drill, and the response program shall be adjusted accordingly.

Actual emergencies shall be investigated to determine what steps might have been taken to prevent the emergency.

Remedial actions shall be taken, as appropriate.

Drills shall be conducted to test the Emergency Response Plan.

The Emergency Response Plan shall be reviewed and updated semiannually to reflect changes involving additional regulatory requirements and personnel, as well as modifications to the site.

The ERT, site management, site EH&S personnel, and the site public spokesperson shall have annual training with respect to emergency response and planning, as well as media training.

APPENDIX A REFERENCED DOCUMENTS

A.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-MF743-00	*GIA Environmental Health and Safety Emergency Response Plan Standard*

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